

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
FLORENCE DIVISION

Caroline Perry, on behalf of herself and  
all others similarly situated,

Plaintiff,

vs.

McLeod Healthcare Network, LLC,

Defendant.

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Civil Action  
No. 4:22-cv-00061-JD

**PLAINTIFFS' UNOPPOSED MOTION  
FOR APPROVAL OF SETTLEMENT  
OF FLSA COLLECTIVE ACTION**

Plaintiff Caroline Perry, on behalf of herself and the Opt-In Plaintiffs (collectively referred to as “Plaintiffs”), hereby files this Unopposed Motion for Approval of Settlement of FLSA Collective Action, requesting that the Court approve the Parties’ Settlement Agreement and Release (“Settlement Agreement”).

Plaintiffs submit that the terms of the Settlement Agreement represent the fair, reasonable, and adequate resolution of a *bona fide* dispute as to Defendant’s alleged liability to the Plaintiffs under the Fair Labor Standards Act, 29 U.S.C. § 216(b) (the “FLSA”) (the “Settlement”). Plaintiffs respectfully request that the Court approve the Settlement Agreement and implement its terms, including the request for attorneys’ fees and costs and service awards to the Named Plaintiff and various other Opt-Ins who participated in discovery and provided significant assistance in the litigation.

The grounds for this Motion, as more fully set forth in the Memorandum and exhibits submitted herewith, are that the Parties have agreed to the settlement of this *bona fide* FLSA dispute after over 22 months of vigorously contested litigation and following extensive, arm’s-length negotiations. The Parties submit that the Settlement is fair, reasonable, and adequate,

particularly in light of the existence of disputed issues of fact, disputed issues of law with respect to liability, whether the Plaintiffs would obtain a judgment in their favor, and the risk of possible appeals. Accordingly, Plaintiffs would respectfully request that the Court approve the Settlement Agreement and implement its terms.

Respectfully Submitted,

FALLS LEGAL, LLC

s/ J. Scott Falls

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November 17, 2023